EXHIBIT A

Gannon, Kevin

From:	Deeva V. Shah <dshah@keker.com>
Sent:	Tuesday, August 10, 2021 1:22 PM
To:	Singular
Cc:	kvpsingular@keker.com; wgs-singularv.google@wolfgreenfield.com; abhansali@kblfirm.com; mkwun@kblfirm.com
Subject:	Singular v. Google	Status Conference

Counsel:

At today's status conference, please be advised that Google intends to seek the Court's guidance regarding amending Google's answer to plead inequitable conduct. Google's basis for that defense arises out of Singular's knowledge of two prior art references that were not disclosed to the PTO: (1) the Belanovic thesis (SINGULAR-00002261) and (2) the Coleman et al. article about the European Logarithmic Microprocessor (SINGULAR-00014391). Google's basis for this anticipated pleading was also formed in part by testimony (or lack thereof) from the depositions of Blueshift and Dr. Bates, including his testimony as a 30(b)(6) designee, all of which took place during the final week of fact discovery.

Given the procedural posture of the case, Google believes it would be more practical to move for leave if and when the stay is lifted, but we plan to seek guidance at today's CMC as to what the Court considers the appropriate time to seek such leave.

Regards,
Deeva

Deeva V. Shah
Keker, Van Nest & Peters LLP
633 Battery Street
San Francisco, CA 94111-1809
757 553 8301 direct (cell) | 415 391 5400 main
dshah@keker.com | vcard | keker.com

1